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Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff.

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

HHI INVESTMENT TRUST #2;

KING HARRIS, in his capacity as trustee of the HHI Investment Trust #2, Pam F. Szokol Trust dated 02/18/93, William J. Friend Trust dated 06/22/95, Scott C. Friend Trust of 1984 under Trust Agreement dated 11/21/84, Bette D. Harris Grandchildren's Trust for the Children of Katherine Harris – Pam Friend Szokol under Trust

Adv. Pro. No. 08-01789 (SMB)

**SIPA** Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05404 (SMB)

Agreement dated 01/13/59, Bette D. Harris Grandchildren's Trust for the Children of Katherine Harris – William Friend under Trust Agreement dated 01/13/59, Bette D. Harris Grandchildren's Trust for the Children of King Harris – John B. Harris under Trust Agreement dated 01/13/59, Bette D. Harris Grandchildren's Trust for the Children of Toni Paul under Trust Agreement dated 01/13/59, Toni Harris Paul Children's Trust dated 12/15/76, and in his capacity as custodian for Charles Henry Paul Under the Illinois Uniform Gifts to Minors Act under Agreement dated 06/01/79, custodian for Kelly Lynn Paul Under the Illinois Uniform Gifts to Minors Act under Agreement dated 10/01/80, custodian for Alan Harris Paul Under the Illinois Uniform Gifts to Minors Act under Agreement dated 12/20/84, and custodian for Laurie Beth Paul Under the Illinois Uniform Gifts to Minors Act under Agreement dated 12/20/84;

KATHERINE P. HARRIS, in her capacity as trustee of the HHI Investment Trust #2, Bette D. Harris Grandchildren's Trust for the Children of Katherine Harris – Pam Friend Szokol under Trust Agreement dated 01/13/59, Bette D. Harris Grandchildren's Trust for the Children of Katherine Harris – William Friend under Trust Agreement dated 01/13/59, Bette D. Harris Grandchildren's Trust for the Children of King Harris – John B. Harris under Trust Agreement dated 01/13/59, Bette D. Harris Grandchildren's Trust for the Children of Toni Paul under Trust Agreement dated 01/13/59, King W. W. Harris Trust for Children under Trust Agreement dated 12/15/76, Toni Harris Paul Children's Trust dated 12/15/76, and in her capacity as custodian for John B. Harris Under the Illinois Uniform Gifts to Minors Act under Agreement dated 12/01/76;

TONI H. PAUL, in her capacity as trustee of the HHI Investment Trust #2;

DENISE SAUL, in her capacity as trustee of the King W. W. Harris Trust for Children under Trust Agreement dated 12/15/76;

SIDNEY BARROWS, in his capacity as trustee of

the King W. W. Harris Trust for Children under Trust Agreement dated 12/15/76;

THE HARRIS FAMILY FOUNDATION;

PAM F. SZOKOL TRUST;

WILLIAM J. FRIEND TRUST DATED 06/22/95;

SCOTT C. FRIEND TRUST OF 1984 UNDER TRUST AGREEMENT DATED 11/21/84;

BETTE D. HARRIS GRANDCHILDREN'S TRUST FOR THE CHILDREN OF KATHERINE HARRIS – PAM FRIEND SZOKOL UNDER TRUST AGREEMENT DATED 01/13/59;

BETTE D. HARRIS GRANDCHILDREN'S TRUST FOR THE CHILDREN OF KATHERINE HARRIS – WILLIAM FRIEND UNDER TRUST AGREEMENT DATED 01/13/59;

BETTE D. HARRIS GRANDCHILDREN'S TRUST FOR THE CHILDREN OF KING HARRIS – JOHN B. HARRIS UNDER TRUST AGREEMENT DATED 01/13/59;

BETTE D. HARRIS GRANDCHILDREN'S TRUST FOR THE CHILDREN OF TONI PAUL UNDER TRUST AGREEMENT DATED 01/13/59;

KING W. W. HARRIS TRUST FOR CHILDREN UNDER TRUST AGREEMENT DATED 12/15/76;

TONI HARRIS PAUL CHILDREN'S TRUST DATED 12/15/76;

KATHERINE HARRIS CUSTODIAN FOR JOHN B. HARRIS UNDER THE ILLINOIS UNIFORM GIFTS TO MINORS ACT UNDER AGREEMENT DATED 12/01/76;

KING HARRIS CUSTODIAN FOR CHARLES HENRY PAUL UNDER THE ILLINOIS UNIFORM GIFTS TO MINORS ACT UNDER AGREEMENT DATED 06/01/79; KING HARRIS CUSTODIAN FOR KELLY LYNN PAUL UNDER THE ILLINOIS UNIFORM GIFTS TO MINORS ACT UNDER AGREEMENT DATED 10/01/80;

KING HARRIS CUSTODIAN FOR ALAN HARRIS PAUL UNDER THE ILLINOIS UNIFORM GIFTS TO MINORS ACT UNDER AGREEMENT DATED 12/20/84;

KING HARRIS CUSTODIAN FOR LAURIE BETH PAUL UNDER THE ILLINOIS UNIFORM GIFTS TO MINORS ACT UNDER AGREEMENT DATED 12/20/84;

JOHN B. HARRIS;

CHARLES HENRY PAUL;

KELLY LYNN PAUL;

ALAN HARRIS PAUL; and

LAURIE BETH PAUL,

Defendants.

## FIFTH AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. Fact Discovery shall be completed by: April 24, 2015
- 2. The Disclosure of Case-in-Chief Experts shall be due: June 17, 2015
- 3. The Disclosure of Rebuttal Experts shall be due: July 31, 2015
- 4. The Deadline for Completion of Expert Discovery shall be: October 14, 2015

- 5. The Deadline for Service of a Notice of Mediation Referral shall be: December 14, 2015
- 6. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: December 28, 2015
- 7. The Deadline for Conclusion of Mediation shall be: April 26, 2016

Dated: New York, New York April 20, 2015

BAKER & HOSTETLER LLP

By:\_/s/ Nicholas J. Cremona

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